

TRUJILLO RODRIGUEZ & RICHARDS, LLC

Lisa J. Rodriguez
8 Kings Highway West
Haddonfield, NJ 08033
(856) 795-9002

Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

WORLDWIDE EQUIPMENT, INC., ON BEHALF
OF ITSELF AND ALL OTHERS SIMILARLY
SITUATED,

PLAINTIFF,

V.

HONEYWELL INTERNATIONAL INC.;
CHAMPION LABORATORIES, INC.;
PUROLATOR FILTERS N.A. L.L.C.;
WIX FILTRATION CORP. LLC; CUMMINS
FILTRATION, INC.; DONALDSON COMPANY,
INC.; BALDWIN FILTERS, INC.; ROBERT
BOSCH LLC; MANN + HUMMELL U.S.A., INC.;
ARVINMERITOR, INC., AND UNITED
COMPONENTS, INC.

DEFENDANTS.

CASE NO. 08-2303

**NOTICE OF MOTION FOR
PRO HAC VICE ADMISSION**

PLEASE TAKE NOTICE that on Monday, July 7, 2008, at 9:00 a.m. or so soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiff shall move before United States District Court, District of New Jersey - Newark Office, Martin Luther King, Jr. , Federal Building & Courthouse, 50 Walnut Street, Newark, N.J. 07102, pursuant to R 1:21-1 to admit Richard L. Creighton, Jr., Esquire *pro hac vice*.

Plaintiff will rely upon the attached Certifications of Richard L. Creighton, Jr. and Lisa J.

Rodriguez in support of this motion.

A proposed form of Order is attached.

Plaintiff submits this motion for a ruling on the papers pursuant to R. 1:6-2.

Dated: June 4, 2008

Respectfully submitted,

TRUJILLO RODRIGUEZ & RICHARDS, LLC

By: /s Lisa J. Rodriguez
Lisa J. Rodriguez
8 Kings Highway West
Haddonfield, New Jersey 08033
Telephone: (856) 795-9002

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Attorneys for Plaintiff

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WORLDWIDE EQUIPMENT, INC., ON BEHALF
OF ITSELF AND ALL OTHERS SIMILARLY
SITUATED,

v.

HONEYWELL INTERNATIONAL INC.;
CHAMPION LABORATORIES, INC.;
PUROLATOR FILTERS N.A. L.L.C.;
WIX FILTRATION CORP. LLC; CUMMINS
FILTRATION, INC.; DONALDSON COMPANY,
INC.; BALDWIN FILTERS, INC.; ROBERT
BOSCH LLC; MANN + HUMMELL U.S.A., INC.;
ARVINMERITOR, INC., AND UNITED
COMPONENTS, INC.

Defendants.

CASE NO. 08-2303

**STATEMENT AS TO WHY NO
BRIEF IS NECESSARY**

The undersigned respectfully submit, pursuant to L. Civ. R. 7.1(d)(1), that no brief is necessary in connection with the motion for an order permitting Richard L. Creighton, Jr., Esquire *pro hac vice* in this matter because such motion is addressed to the discretion of the District Judge and does not raise an issue of law.

Dated: June 4, 2008

Respectfully submitted,

TRUJILLO RODRIGUEZ & RICHARDS, LLC

By: s/ Lisa J. Rodriguez

Lisa J. Rodriguez
8 Kings Highway West
Haddonfield, New Jersey 08033
Telephone: (856) 795-9002

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Attorney for Plaintiff

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DEFENDANTS.

CASE NO. 08-2303

**CERTIFICATION OF
LISA J. RODRIGUEZ**

I, Lisa J. Rodriguez, certify as follows:

1. I am a member of the law firm of Trujillo Rodriguez & Richards, LLC, counsel for Plaintiff in the above-captioned matter. I submit this Certification in Support of Plaintiff's Motion for an Order admitting Richard L. Creighton, Jr., Esquire *pro hac vice* in the within matter pursuant to Local Civil Rule 101.1(c). I am personally familiar with the facts set forth in this Certification.

2. If the Court grants the above-referenced motion for *pro hac vice* admission, either I or another attorney associated with Trujillo Rodriguez & Richards, LLC will continue to serve

as local counsel of record in this matter, will review and sign all pleadings, briefs, and other papers filed with the Court, will be responsible for the conduct of this action and for the conduct of the attorneys admitted *pro hac vice*, and will otherwise comply with all the terms and conditions of Local Civil Rule 101.1(c).

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: June 4, 2008

Respectfully submitted,

TRUJILLO RODRIGUEZ & RICHARDS, LLC

By: /s Lisa J. Rodriguez
Lisa J. Rodriguez
8 Kings Highway West
Haddonfield, New Jersey 08033
Telephone: (856) 795-9002

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

WORLDWIDE EQUIPMENT, INC.

Civil Action No. 08-2303 (WHW)
(CCC)

v.

HONEYWELL INTERNATIONAL INC., et al.

Judge Claire C. Cecchi

**CERTIFICATION OF RICHARD L. CREIGHTON, JR., ESQUIRE
IN SUPPORT OF THE MOTION FOR
PRO HAC VICE ADMISSION**

I, Richard L. Creighton, Jr., Esquire, hereby certify as follows:

1. I am an attorney in the law firm of Keating Muething & Klekamp PLL, One East Fourth Street, Suite 1400, Cincinnati, Ohio, 45202-3752, and I make this certification in support of my *pro hac vice* admission to this Court pursuant to Local Civil Rule 101.1.
2. I am a member in good standing of the Bar of the Supreme Court of the State of Ohio.
3. I am admitted to practice in the United States District Court, Southern District of Ohio, Western Division; United States District Court, Eastern District of Kentucky; United States Court of Appeals for the Sixth Circuit; and the Supreme Court of the United States.
4. There are no disciplinary proceedings pending against me as a member of the Bar in any jurisdiction.
5. I have been requested to represent Plaintiff in this matter.
6. This matter involves antitrust law brought by Worldwide Equipment, Inc. against Honeywell International Inc.; Champion Laboratories, Inc.; Purolator Filters N.A. L.L.C.; Wix Filtration Corp. LLC; Cummins Filtration, Inc.; Donaldson Company, Inc.; Baldwin Filters, Inc.;

Robert Bosch LLC; Mann + Hummell U.S.A., Inc.; Arvinmeritor, Inc.; and United Components, Inc.

7. Given my experience in litigating such claims and my familiarity with the issues involved in this matter, my admission *pro hac vice* will serve the interests of the Plaintiff and will also facilitate the efficient litigation of this matter. The cause in which I seek admission involves a complex field of law in which I am a specialist.

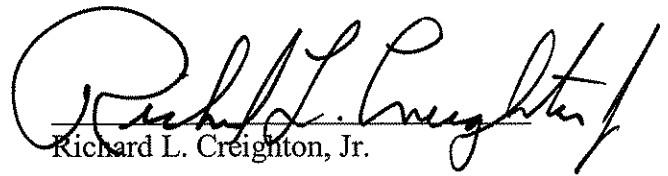
8. I have associated in this matter with a New Jersey attorney, Lisa J. Rodriguez, Esquire of Trujillo Rodriguez & Richards, LLC, 8 Kings Highway West, Haddonfield, NJ 08033, as required by Local Rule 4.

9. I further agree to:

- a. make payment to the New Jersey Lawyer's Fund for Client Protection as provided by New Jersey Court Rule 1:28-2(a), and pursuant to R.1:20-1(b) and the client's Security Fund of the Bar of New Jersey pursuant to R.1:20-2;
- b. make payment of \$150.00 to the Clerk of the United States District Court in accordance with L.Civ.R. 101.1(c)(3) as amended, within 20 days from the date of the executed Order;
- c. abide by New Jersey court rules;
- d. notify this Court immediately of any matter effecting my standing at the Bar of any other court; and
- e. have all pleadings, briefs, and other papers filed with the Court signed by an attorney of record authorized to practice in New Jersey.

I certify that the foregoing statements made by me are true.

Date: June 3, 2008



A handwritten signature in black ink, appearing to read "Richard L. Creighton, Jr." The signature is fluid and cursive, with "Richard" and "L. Creighton" being more distinct and "Jr." being smaller at the end.

2518535.1

TRUJILLO RODRIGUEZ & RICHARDS, LLC

Lisa J. Rodriguez
8 Kings Highway West
Haddonfield, NJ 08033
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Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
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PROPOSED] ORDER

THIS MATTER, having been opened to the Court by Lisa J. Rodriguez, Esquire, of Trujillo Rodriguez & Richards, LLC, counsel for Plaintiff, by way of motion for the *pro hac vice* admission of Richard L. Creighton, Jr., Esquire and the Court having considered the Certifications of the attorneys in support of the motion, it is hereby ORDERED that:

1. Richard L. Creighton, Jr. is hereby admitted *pro hac vice*, to appear in this matter on behalf of Plaintiff;

2. Richard L. Creighton, Jr. is hereby required to abide by the rules of this Court and the rules governing the courts of the State of New Jersey including all disciplinary rules;

3. Richard L. Creighton, Jr. consents to the appointment of the Clerk of the Supreme Court as agent upon whom service of process may be made for all actions against the attorney for the attorney's firm that may arise out of the attorney's standing at the bar of any other court;

4. Richard L. Creighton, Jr. is hereby required to notify the Court of any matter affecting him standing at the bar of any court;

5. Richard L. Creighton, Jr. shall have all pleading, briefs, and other papers filed with the Court signed by an attorney-of-record authorized to practice in this State, who shall be held responsible for them and for the conduct of the cause and of the attorneys admitted *pro hac vice*;

6. Richard L. Creighton, Jr. shall make payment of \$150.00 to the Clerk of the United States District Court in accordance with L. Civ.R. 10.1(c)(3) as amended, within 20 days from the date of the entry of this Order; and

7. Richard L. Creighton, Jr. shall comply with the obligations of any attorney admitted to practice in this Court and shall make payment to New Jersey Lawyers' Fund for client protection as provided by New Jersey Court Rule 1:28-2(a).

Dated: July ___, 2008

Magistrate Judge Claire C. Cecchi.

TRUJILLO RODRIGUEZ & RICHARDS, LLC

Lisa J. Rodriguez
8 Kings Highway West
Haddonfield, NJ 08033
(856) 795-9002

Attorney for Plaintiff

**IN THE UNITED STATES DISTRICT COURT
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WORLDWIDE EQUIPMENT, INC., ON BEHALF
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DEFENDANTS.

CASE NO. 08-2303

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Plaintiff's Notice of Motion to admit Richard L. Creighton, Jr., Esquire *Pro Hac Vice*, Certifications of Richard L. Creighton, Jr., Esquire in Support of the Motion for *Pro Hac Vice* Admission, Certification of Lisa J. Rodriguez in Support of the Motion for *Pro Hac Vice* Admission and a Proposed Order were forwarded to Magistrate Judge Claire C. Cecchi via UPS. Please be advised that counsel for Defendants have not entered

their appearance to date. I will forward copies to their attention when appearances have been entered.

Dated: June 4, 2008

By: /s Lisa J. Rodriguez
Lisa J. Rodriguez